

**Response to Defendants' Objections to Attorneys' Fees**

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
12/8/2009	0.50	Telephone call (t/c) with Shirley Baccus-Loebel (SBL) about Richard Winfrey, Jr. (RWJ); emails with SBL regarding possible case and defendants	GH	Vague. Initial analysis of case related to ramp-up and applies to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/18/2009	2.50	Email with Natalie Roetzel (IP) and review attached transcripts of Lenard Brisbin and Keith Pikett	GH	Vague. Initial analysis of case related to ramp-up and applies to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/4/2010	1.50	Meeting with RWJ about representation	GH	Vague. Initial analysis of case related to ramp-up and applies to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/12/2010	0.25	T/c with Vickie Winfrey about case	GH	Vague. Initial analysis of case related to ramp-up and applies to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/16/2010	4.00	Email with Vickie Winfrey, review Megan Winfrey transcripts (8 volumes) provided by Vickie	GH	Vague. Initial analysis of case related to ramp-up and applies to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
2/3/2010	0.25	Email with SBL about Winfrey case	GH	Vague. Initial analysis of case related to ramp-up and applies to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

**Response to Defendants' Objections to Attorneys' Fees**

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
2/19/2010	0.50	t/c with RWJ about representing him on case	GH	Vague. Initial analysis of case related to ramp-up and applies to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
3/17/2010	0.25	t/c with SBL about getting documents/files regarding RWJ	GH	Vague. Initial analysis of case related to ramp-up and applies to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
4/26/2010	2.00	Review case materials from SBL	GH	Vague. Initial analysis of case related to ramp-up and applies to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
5/4/2010	2.00	Research legal claims and draft Complaint	GH	Vague. Complaint applied to all defendants, not just Deputy Johnson.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
5/5/2010	3.00	Finish drafting Complaint	GH	Vague. Complaint applied to all defendants, not just Deputy Johnson.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
5/11/2010	0.50	Review additional materials to help draft Complaint	GH	Vague. Complaint applied to all defendants, not just Deputy Johnson.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

**Response to Defendants' Objections to Attorneys' Fees**

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
5/14/2010	0.25	email with SBL regarding draft Complaint	GH	Vague. Complaint applied to all defendants, not just Deputy Johnson.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
5/17/2010	0.25	email with Jon Loevy (JL) and Mike Kanovitz (MK) about draft Complaint	GH	Vague. Complaint applied to all defendants, not just Deputy Johnson.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
5/24/2010	0.50	Review and insert edits into draft Complaint	GH	Vague. Complaint applied to all defendants, not just Deputy Johnson.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
5/26/2010	0.25	Proofread Complaint before filed	GH	Vague. Complaint applied to all defendants, not just Deputy Johnson.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
6/2/2010	0.25	Call with reporter at Inside Edition regarding Winfrey case	GH	Vague. Initial analysis of case related to ramp-up and applies to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
6/30/2010	0.25	Review answer by Pikett, Fort Bend County	GH	Pikett and Fort Bend County are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

**Response to Defendants' Objections to Attorneys' Fees**

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
7/20/2010	0.50	Review motion to dismiss filed by Huff & Duff	GH	Duff and Huff are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
7/23/2010	0.25	Review answer by Rogers, Johnson, San Jacinto County	GH	Should be discounted because Rogers and San Jacinto County not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
7/26/2010	0.25	t/c with Rachel Steinback (RS) about upcoming court conference	GH	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
7/27/2010	0.25	t/c with RS about what happened at court conference	GH	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
8/13/2010	4.00	Review criminal trial transcripts of Richard Winfrey, Sr.	GH	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/22/2010	0.50	conferring with RS (Rachel Steinback) re: pretrial conference, disco issues	EW	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

**Response to Defendants' Objections to Attorneys' Fees**

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
9/22/2010	5.00	reviewing complaint and responsive pleadings, documents, Judge Hughes' standing order in prep for pretrial conference	EW	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/22/2010	2.50	Emails with SBL re: Sr and review Sr. opinion in Texas Court of Criminal Appeals	GH	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/24/2010	3.00	preparing for pretrial conference by reviewing pleadings, disco issues	EW	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/24/2010	3.00	attending pretrial conference	EW	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
10/1/2010	0.25	reviewing order dismissing Walters as defendant	EW	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/9/2010	0.50	t/c with Elizabeth Wang (EW) and email with JI regarding strategy for responding to forthcoming SJ	GH	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
11/18/2010	1.00	Conf. w/ LW re assisting on SJ response; Reading MSJ reviewing record (including police reports; videos of sniffs; criminal defense file; Pikett deposition; transcripts from criminal trial; <del>complaint and pleadings to date</del> );	DL	Prior to Deputy Johnson's MSJ, vague, unknown if applicable to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/19/2010	2.00	Conf. w/ LW re re response; reviewing record/MSJ; research	DL	Prior to Deputy Johnson's MSJ, vague, unknown if applicable to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/29/2010	4.00	Reading record	DL	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/30/2010	5.00	Reading record	DL	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/1/2010	5.00	Reading record	DL	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/2/2010	5.00	Reading record; research	DL	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
12/3/2010	5.00	Research; outlining issues for SJ response	DL	Vague, prior to Deputy Johnson's MSJ filing and unknown if applicable to all defendants.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
12/6/2010	5.00	Drafting SOF for SJ response	DL	Prior to Deputy Johnson's MSJ filing and total SOF was 119 words which was incorporated by reference. [Junior Doc. 52 at 3]. Vague, unknown if applicable to all defendants.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
12/7/2010	5.00	Drafting SOF for SJ response	DL	Prior to Deputy Johnson's MSJ filing and total SOF was 119 words which was incorporated by reference. [Junior Doc. 52 at 3]. Vague, unknown if applicable to all defendants.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
12/8/2010	5.00	Drafting SOF for SJ response	DL	Prior to Deputy Johnson's MSJ filing and total SOF was 119 words which was incorporated by reference. [Junior Doc. 52 at 3]. Vague, unknown if applicable to all defendants.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
12/9/2010	5.00	Research/outlining; strategy session	DL	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
12/13/2010	2.00	Reviewed expert report; discussion re	DL	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.

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12/21/2010	3.00	Reviewed MTD/SJ by San Jacinto Cty, Rogers & Johnson; research	DL	San Jacinto County and Rogers are excluded parties with no common core of facts of legal claims asserted with Deputy Johnson, not recoverable.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
1/3/2011	0.25	Email with EW and Debra Loevy (DL) following return from maternity leave about outstanding to do items for summary judgment	GH	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/3/2011	3.00	Review SJ motions that were filed by the Defendants	GH	Vague, unknown if applicable to all defendants with "motions" and "Defendants".	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/4/2011	0.25	t/c with DL regarding responding to pending SJ	GH	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/4/2011	0.25	Email with EW about getting expert in Winfrey	GH	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/4/2011	0.50	t/c with Steven Nicely, retained as expert	GH	Vague. Applies to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.



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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
1/4/2011	4.00	Read criminal trial tx in RWJ	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/9/2011	5.00	Drafting SJ response; research re	DL	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
1/10/2011	5.00	Drafting SJ response; research re	DL	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
1/11/2011	5.00	Drafting SJ response; research re	DL	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
1/12/2011	5.00	Drafting SJ response; research re	DL	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
1/13/2011	5.00	Drafting SJ response; research re	DL	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
1/16/2011	5.00	Drafting SJ response; research re	DL	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
1/17/2011	5.00	Drafting SJ response; research re	DL	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
1/18/2011	5.00	Drafting SJ response	DL	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
1/19/2011	5.00	Drafting SJ response	DL	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
1/20/2011	5.00	Drafting SJ response	DL	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
1/21/2011	0.50	email with EW and RS about discovery in case	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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1/21/2011	0.50	email with Steven Nicely about RWJ case and his report	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/22/2011	1.00	review lineup videos for Megan Winfrey's and RWJ case	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/23/2011	3.00	Editing SJ response	DL	Vague, unknown if applicable to all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/23/2011	4.00	Review criminal trial transcripts for RWJ and begin drafting summary judgment response	GH	Vague, unknown if applicable to all defendants. DL already billed 108 hours to drafting the MSJ response.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/24/2011	10.00	review additional documents and draft facts for summary judgment	GH	Vague, unknown if applicable to all defendants. DL already billed 108 hours to drafting the MSJ response (including facts).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/25/2011	11.00	Continue drafting facts for summary judgment response; research legal issues	GH	Vague, unknown if applicable to all defendants. DL already billed 108 hours to drafting the MSJ response.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
1/26/2011	0.50	Reviewed nicely affidavit	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/26/2011	8.00	research legal claims; continue drafting responses	GH	Vague, unknown if applicable to all defendants. DL already billed 108 hours to drafting the MSJ response.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/27/2011	3.00	Incorporating comments/suggestions; final edits to SJ response	DL	Vague, unknown if applicable to all defendants.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.
1/27/2011	10.00	Continue drafting responses to summary judgment	GH	Vague, unknown if applicable to all defendants because "responses". DL already billed 111 hours to drafting the MSJ response.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/28/2011	12.00	Draft Rule 56(d) affidavit, finish writing and editing summary judgment responses and file summary judgment responses	GH	Vague, unknown if applicable to all defendants because "responses". DL already billed 111 hours to drafting the MSJ response.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
2/11/2011	3.00	Read Defendants' replies in support of their summary judgment motions; motion to strike	GH	Vague, unknown if applicable to all defendants with "motions" and "Defendants".	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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2/15/2011	3.00	Draft response to motion to strike; incorporate edits from Russell Ainsworth (RA)	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
2/16/2011	0.25	Finalize and file motion to strike	GH	Clerical work. Time should be reduced for filing.	Work is not clerical when read in context. Moreover, even if clerical, solution is not to reduce time but to bill clerical work of an attorney at the rate for paralegal. <i>See</i> Brief, Section IV.
4/8/2011	0.25	Review dismissal; email with EW and JL re: dismissal	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
7/9/2011	0.50	reading opinion and order granting SJ	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
7/9/2011	0.50	Review SJ opinion; dismissal	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
7/23/2011	0.50	t/c with RWJ about dismissal and possible appeal	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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7/28/2011	0.25	Draft and file notice of appeal	GH	Clerical work. Time should be reduced for filing.	Work is not clerical when read in context. Moreover, even if clerical, solution is not to reduce time but to bill clerical work of an attorney at the rate for paralegal. <i>See</i> Brief, Section IV.
8/22/2011	4.00	Conf. GH re handling this appeal; began reading through docket	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
8/22/2011	0.50	t/c with DL about DL handling appeal	GH	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
8/23/2011	4.50	Reading record	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
8/24/2011	4.50	Reading record	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
8/25/2011	4.50	Reading record	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
8/26/2011	4.00	Reading record	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
8/29/2011	2.00	Reading record	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
8/30/2011	4.50	Drafting SOF	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
8/31/2011	4.50	Drafting SOF	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/1/2011	4.50	Drafting SOF	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

## Response to Defendants' Objections to Attorneys' Fees

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
9/2/2011	3.00	Research re legal issues for brief	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/6/2011	4.50	Research re legal issues for brief	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/7/2011	4.50	Drafting opening brief legal arguments/research	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/8/2011	4.50	Drafting opening brief legal arguments/research	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/9/2011	3.50	Drafting opening brief legal arguments/research	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/12/2011	4.00	Drafting opening brief legal arguments/research	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.



## Response to Defendants' Objections to Attorneys' Fees

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
9/13/2011	4.50	Drafting opening brief legal arguments/research	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/14/2011	4.50	Rec'd ROA; incorporated pagination to opening brief; drafted	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/15/2011	4.50	Drafting opening brief	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/16/2011	4.00	Drafting opening brief; conf. w/ GH re strategy	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/19/2011	3.00	Revising and editing opening brief	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/19/2011	0.50	t/c with DL regarding strategy for appeal	GH	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
9/20/2011	4.00	Rough draft of brief to GH, incorporated edits and revised	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/21/2011	3.00	Review draft and email with DL about suggested edits	GH	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/23/2011	4.00	Rough draft of brief to JL, incorporated brief and revised	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/26/2011	2.00	Finalized and filed appellant brief and RE's	DL	Clerical work. Time should be reduced for filing.	Work is not clerical when read in context. Moreover, even if clerical, solution is not to reduce time but to bill clerical work of an attorney at the rate for paralegal. <i>See</i> Brief, Section IV.
9/26/2011	0.50	emails with DL regarding facts on appeal	GH	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/26/2011	0.50	helped finalize appellate brief	GH	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

## Response to Defendants' Objections to Attorneys' Fees

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
10/6/2011	0.50	email with RWJ re: case update and media inquiry	GH	Vague. Unknown if related to claims for all defendants.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
10/28/2011	3.00	Reading Fort Bend County appellee brief and RE's filed; research re	DL	Fort Bend County not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
10/31/2011	2.50	Reading San Jacinto appellee brief and RE's filed; research re	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/1/2011	4.00	Drafting reply brief	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/1/2011	3.00	read through appellee's briefs (San Jacinto County, Fort Bend County)	GH	Should be discounted because Fort Bend County not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
11/2/2011	4.00	Drafting reply brief	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
11/3/2011	4.00	Drafting reply brief	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty .</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/4/2011	3.50	Drafting reply brief	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty .</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/14/2011	3.00	Reading Duff and Huff appellee brief RE's filed; research re	DL	Duff and Huff are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
11/15/2011	2.00	Drafting reply brief, adding in Duff and Huff reply; editing reply	DL	Duff and Huff are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
11/15/2011	1.00	read through Huff/Duff appellate brief	GH	Duff and Huff are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
11/21/2011	4.00	Drafting reply brief, adding in Duff and Huff reply; editing reply	DL	Duff and Huff are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.

## Response to Defendants' Objections to Attorneys' Fees

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
11/22/2011	4.00	Sent draft of reply to GH and JL; incorporated edits and suggestions; research; drafting reply	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/22/2011	2.00	Review draft reply and email edits to DL	GH	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/28/2011	2.00	Edited and finalized and reply brief	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/28/2011	1.00	Review draft reply and make additional edits	GH	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/3/2011	0.25	emails with RWJ re: update and media article	GH	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
4/20/2012	0.50	emails with RWJ re: update on case	GH	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty.</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
5/25/2012	5.00	Reviewing briefs and case law; checking for updated authority; prepping for oral argument	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
5/29/2012	4.00	Prepping for oral argument	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
5/30/2012	5.00	Prepping for oral argument	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
5/31/2012	5.00	Prepping and mootng oral argument	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
6/3/2012	6.00	Practicing argument	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
6/4/2012	2.00	Oral argument/time at court awaiting argument	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty</i> ., 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
6/6/2012	1.00	Researching/drafting motion for SOJ on remand	DL	Vague. Remand was for Sherriff Rogers too, not only Deputy Johnson.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
7/12/2012	0.50	Reading 5 <sup>th</sup> Circuit decision	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty .</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
8/8/2012	0.50	Bill of costs review/Objection to appellee's bill of costs	DL	Vague. Appeal related to dismissal of claims against all defendants, not only Deputy Johnson. <i>Winfrey v. San Jacinto Cty .</i> , 481 F. App'x 969 (5th Cir. 2012).	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
9/20/2012	0.50	conferring with EW, JL and RS about discovery to-dos & settlement demand letter	GH	Settlement was with Fort Bend County and Deputy Pikett, not Deputy Johnson.	Settlement demand was global demand. Hours are recoverable because claims share common core and legal theories. <i>See</i> Brief, Section I.
9/20/2012	0.50	conferring with Gayle Horn (GH), Jon Loevy (JL), RS about discovery to-dos & settlement demand letter	EW	Settlement was with Fort Bend County and Deputy Pikett, not Deputy Johnson.	Settlement demand was global demand. Hours are recoverable because claims share common core and legal theories. <i>See</i> Brief, Section I.
10/5/2012	1.00	read appellate opinion in RWJ; confer with EW about settlement demand and items to ask for in discovery	GH	Settlement was with Fort Bend County and Deputy Pikett, not Deputy Johnson.	Settlement demand was global demand. Hours are recoverable because claims share common core and legal theories. <i>See</i> Brief, Section I.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
10/5/2012	0.50	conferring with GH about settlement demand and items to ask for in discovery	EW	Settlement was with Fort Bend County and Deputy Pikett, not Deputy Johnson.	Settlement demand was global demand. Hours are recoverable because claims share common core and legal theories. <i>See</i> Brief, Section I.
10/17/2012	0.25	conferring with GH about settlement demand and discovery	GH	Settlement was with Fort Bend County and Deputy Pikett, not Deputy Johnson.	Settlement demand was global demand. Hours are recoverable because claims share common core and legal theories. <i>See</i> Brief, Section I.
10/17/2012	0.25	conferring with GH about settlement demand and discovery	EW	Settlement was with Fort Bend County and Deputy Pikett, not Deputy Johnson.	Settlement demand was global demand. Hours are recoverable because claims share common core and legal theories. <i>See</i> Brief, Section I.
11/5/2012	0.25	conferring with EW about settlement demand	GH	Settlement was with Fort Bend County and Deputy Pikett, not Deputy Johnson.	Settlement demand was global demand. Hours are recoverable because claims share common core and legal theories. <i>See</i> Brief, Section I.
11/5/2012	0.50	conferring with GH about settlement demand, calling Rex Easley again, emailing colleague re: thoughts on settlement demand in texas	EW	Settlement was with Fort Bend County and Deputy Pikett, not Deputy Johnson.	Settlement demand was global demand. Hours are recoverable because claims share common core and legal theories. <i>See</i> Brief, Section I.
11/6/2012	0.25	corresponding with EW about RWJ contact info, settlement demand	GH	Settlement was with Fort Bend County and Deputy Pikett, not Deputy Johnson.	Settlement demand was global demand. Hours are recoverable because claims share common core and legal theories. <i>See</i> Brief, Section I.



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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
11/6/2012	0.50	t/c with RWJ re: case and settlement demand	GH	Settlement was with Fort Bend County and Deputy Pikett, not Deputy Johnson.	Settlement demand was global demand. Hours are recoverable because claims share common core and legal theories. <i>See</i> Brief, Section I.
11/6/2012	0.25	corresponding with GH about richie contact info, settlement demand	EW	Settlement was with Fort Bend County and Deputy Pikett, not Deputy Johnson.	Settlement demand was global demand. Hours are recoverable because claims share common core and legal theories. <i>See</i> Brief, Section I.
11/7/2012	0.75	t/c with GH about joint discovery plan, Rule 26f conference, status hearing on 12/5 and consent to magistrate for trial, reading & responding to Jim Price's email	EW	Vague. Could apply to multiple defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/7/2012	0.25	review email from Jim Price; t/c with EW about JDCMP and referral	GH	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/8/2012	0.25	reviewing letter re: consent to magistrate, sending signed one back to Jim Price (counsel for Johnson and Rogers)	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/9/2012	0.25	reviewing disclosure statement filed by Rogers & Johnson, reviewing FRCP 7.1	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
11/12/2012	2.00	reviewing draft JDCMP, editing JDCMP	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/12/2012	2.00	reviewing pleadings and disco to edit JDCMP	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/12/2012	2.25	reviewing docs to prepare initial disclosures	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/13/2012	2.50	reviewing docs to prepare initial disclosures	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/14/2012	0.25	conferring with GH about initial disclosures, JDCMP	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/14/2012	0.25	conferring with EW about initial disclosures, JDCMP	GH	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

## Response to Defendants' Objections to Attorneys' Fees

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
11/15/2012	0.25	corresponding with opp counsel about JDCMP	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/15/2012	1.25	telephonic Rule 26(f) conference	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/15/2012	2.50	reviewing docs for initial disclosures, writing initial disclosures, reviewing appeal brief of Rogers & Johnson to see what they said about affidavit for warrant on Jr.	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/15/2012	0.50	drafting Rule 7.1 disclosure, conferring with GH	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/15/2012	0.25	emails with EW and review LR 7.1 disclosure	GH	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/16/2012	1.00	revising JDCMP, corresponding with opp counsel about JDCMP	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

**Response to Defendants' Objections to Attorneys' Fees**

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
12/4/2012	1.00	researching/reading mag judge's opinions on disco	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/12/2012	0.75	review Plaintiffs' initial disclosures; review Defendants' initial disclosures; confer with EW re: initial disclosures	GH	Vague, unknown if applicable to all defendants with "Defendants".	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/13/2012	0.50	t/c with Morse re: getting copies of docs	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/17/2012	2.50	writing interrogatories and doc requests to defs	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/17/2012	0.25	t/c with secretary to Jim Price re: mot ext on disco briefs	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/17/2012	0.25	emailing GH draft disco, updating GH about disco brief ext	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

**Response to Defendants' Objections to Attorneys' Fees**

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
12/17/2012	0.25	emailing EW draft disco, updating EW about disco brief ext	GH	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/19/2012	1.00	review and edit Plaintiffs' initial discovery reaquests	GH	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/20/2012	4.00	writing interrogatories and doc requests to defs	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/30/2012	7.00	writing discovery brief, researching case law	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/31/2012	1.00	reviewing, implementing edits to brief from GH	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/1/2013	1.00	Review, edit and confer with EW re: discovery brief	GH	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
1/7/2013	0.25	conferring with GH about Rogers and Johnsons' brief and response	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/7/2013	0.25	conferring with EW about Rogers and Johnson's brief and response	GH	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/9/2013	0.25	drafting dep notice to Defs, sending out to Defs Pikett, Rogers and Johnson	EW	Pikett is an excluded party, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
1/11/2013	1.50	reviewing discovery brief filed by Defs, preparing response, reviewing trial transcripts	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/14/2013	4.50	writing response brief to Defs' motion to limit and conduct discovery in stages	EW	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/14/2013	0.25	corresponding with counsel for Huff and Duff on whether she will accept service of dep subpoenas	EW	Duff and Huff are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.

**Response to Defendants' Objections to Attorneys' Fees**

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
1/15/2013	0.25	edit EW briefs	GH	Vague. Could apply to multiple defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. See Brief, Section I. Description is sufficient for Court to conduct meaningful review. See Brief, Section III.
1/15/2013	1.00	reviewing GH edits, finalizing and revising brief and filing	EW	Clerical work. Time should be reduced for filing.	Work is not clerical when read in context. Moreover, even if clerical, solution is not to reduce time but to bill clerical work of an attorney at the rate for paralegal. See Brief, Section IV.
1/17/2013	0.25	confer with EW about Plaintiff's response to Pikett rogs	GH	Pikett is an excluded party, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. See Brief, Section I.
1/22/2013	0.25	responding to Price's e-mail about extension on discovery	EW	Vague. Could apply to multiple defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. See Brief, Section I. Description is sufficient for Court to conduct meaningful review. See Brief, Section III.
1/23/2013	0.25	conferring with EW about Pikett's protective order	GH	Pikett is an excluded party, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. See Brief, Section I.
1/25/2013	0.25	review Plaintiffs' responses to Pikett's interrogatories; confer with EW about responses	GH	Pikett is an excluded party, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. See Brief, Section I.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
2/6/2013	0.50	Review Rogers' and Johnson's responses to Plaintiff's interrogatories	GH	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. See Brief, Section I. Description is sufficient for Court to conduct meaningful review. See Brief, Section III.
2/13/2013	0.50	Review documents produced by Rogers and Johnson	GH	Vague. Could apply to dismissed defendant Sherriff Rogers, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. See Brief, Section I. Description is sufficient for Court to conduct meaningful review. See Brief, Section III.
2/20/2013	0.25	writing dep subpoenas for Huff and Duff	EW	Duff and Huff are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. See Brief, Section I.
3/1/2013	0.25	conferring with GH about Jason King	EW	Vague. Could apply to multiple defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. See Brief, Section I. Description is sufficient for Court to conduct meaningful review. See Brief, Section III.
3/1/2013	0.25	conferring with EW about Jason King	GH	Vague. Could apply to multiple defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. See Brief, Section I. Description is sufficient for Court to conduct meaningful review. See Brief, Section III.
3/3/2013	4.75	reviewing docs produced by Pikett, preparing for Pikett dep	EW	Pikett is an excluded party, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. See Brief, Section I.



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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
3/5/2013	3.00	preparing for Pikett dep; reviewing docs produced by Pikett, preparing outline	EW	Pikett is an excluded party, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
3/12/2013	0.25	emailing with Molinare about Huff and Duff start times	EW	Duff and Huff are excluded parties, not recoverable. Have not proved deposition was necessary.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Huff and Duff were trial witnesses and their depositions were used to prepare their
3/14/2013	0.25	emailing with GH about discovery to dos	EW	Vague. Could apply to multiple defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
3/15/2013	3.25	prepping for Huff and Duff deps by reviewing documents and preparing outlines	EW	Duff and Huff are excluded parties, not recoverable. Have not proved deposition was necessary.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Huff and Duff were trial witnesses and their depositions were used to prepare their
3/17/2013	2.00	reviewing documents for Rogers, Duff, Huff, and Johnson deps	EW	Duff and Huff are excluded parties, not recoverable. Have not proved deposition was necessary.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Huff and Duff were trial witnesses and their depositions were used to prepare their
3/19/2013	0.25	emailing with Shanna Molinare about deps of Huff and Duff	EW	Duff and Huff are excluded parties, not recoverable. Have not proved deposition was necessary.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Huff and Duff were trial witnesses and their depositions were used to prepare their

## Response to Defendants' Objections to Attorneys' Fees

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
3/20/2013	5.00	preparing for Johnson and Rogers depositions by reviewing documents and preparing outlines	EW	Vague. Could apply to dismissed defendant Sheriff Rogers, not just Deputy Johnson and the only successful claim. Have not proved deposition was necessary.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Johnson was the Defendant in this case and both he and Rogers testified at trial. Their
3/21/2013	1.25	preparing for Rogers deposition by reviewing documents and preparing outlines, reviewing notes from Johnson deposition	EW	Vague. Could apply to dismissed defendant Sheriff Rogers, not just Deputy Johnson and the only successful claim. Have not proved deposition was necessary for use in successful	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Johnson was the Defendant in this case and both he and Rogers testified at trial. Their
3/22/2013	7.00	deposing Rogers	EW	Vague. Could apply to dismissed defendant Sheriff Rogers, not just Deputy Johnson and the only successful claim. Have not proved deposition was necessary for use in successful	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Johnson was the Defendant in this case and both he and Rogers testified at trial. Their
3/22/2013	0.50	conferring with GH about deposing the other asst Das	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Johnson's defense was that a D.A. wrote his arrest-warrant affidavit, and depositions of the
3/22/2013	0.50	conferring with EW about deposing the other asst DAs	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Johnson's defense was that a D.A. wrote his arrest-warrant affidavit, and depositions of the
3/27/2013	0.50	t/c with Shanna Molinare about depositions of Huff and Duff and analysts	EW	Duff and Huff are excluded parties, not recoverable. Have not proved deposition was necessary.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Huff and Duff were trial witnesses and their depositions were used to prepare their

## Response to Defendants' Objections to Attorneys' Fees

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
4/10/2013	0.75	drafting subpoenas to Huff, Duff, Rangers, the forensic analysts	EW	Duff and Huff are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
4/19/2013	0.25	t/c with GH about discovery issues, persons to depose	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. This entry does not specify any particular "deposition" that was necessary but instead a strategy
4/19/2013	0.25	t/c with EW about discovery issues, persons to depose	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. This entry does not specify any particular "deposition" that was necessary but instead a strategy
4/23/2013	0.25	conferring with EW re: witnesses to speak with, discovery strategy and depositions left	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. This entry does not specify any particular "deposition" that was necessary but instead a strategy
4/23/2013	0.75	research on witnesses Jessup, Robertson, Gladden, Hammond, Tracy Brown	EW	Tracy Brown and Hammond are not applicable to the successful claim against Deputy Johnson.	Entry describes more than the Brown and Hammond but also Ms. Winfrey's teachers, who were discussed in Johnson's arrest-warrant affidavits. Development of evidence about Brown and Hammond is
4/23/2013	0.50	t/c with investigator Mort Smith re: visits to Campbell, Daigle, King, Brown, and Hammond	EW	Brown and Hammond are not applicable to the successful claim against Deputy Johnson.	Entry describes more than the Brown and Hammond but also Campbell, who was discussed in Johnson's arrest-warrant affidavits, and King and Daigle. Development of evidence about Brown and

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
4/26/2013	0.50	drafting subpoena duces tecum to SJC Criminal DA office	EW	San Jacinto County is an excluded party with no common core of facts of legal claims asserted with Deputy Johnson, not recoverable.	Subpoena was to D.A.'s Office for criminal file, not for documents related to claim against SJC. Additionally, claims share common core and legal theories and therefore hours are not severable. See
4/29/2013	5.00	prep for Duff, Huff, and forensic analyst deps (Freeman, Stasicha, McWhorter), by reviewing documents and prior testimony and preparing outline	EW	Duff and Huff are excluded parties, not recoverable. Have not proved deposition was necessary.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Huff and Duff were trial witnesses and their depositions were used to prepare their
4/30/2013	1.00	conferring with GH about discovery strategy, deps left to do	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. This entry does not specify any particular "deposition" that was necessary but instead a strategy
4/30/2013	1.00	conferring with EW about discovery strategy, deps left to do	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. This entry does not specify any particular "deposition" that was necessary but instead a strategy
4/30/2013	1.00	preparing for Huff dep by reviewing documents, preparing outline	EW	Duff and Huff are excluded parties, not recoverable. Have not proved deposition was necessary.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Huff and Duff were trial witnesses and their depositions were used to prepare their
4/30/2013	1.00	preparing for Duff dep by reviewing documents	EW	Duff and Huff are excluded parties, not recoverable. Have not proved deposition was necessary.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Duff was a trial witness and his deposition was used to prepare his examination.

**Response to Defendants' Objections to Attorneys' Fees**

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
4/30/2013	6.50	taking depositions of Huff and Freeman	EW	Duff and Huff are excluded parties, not recoverable. Have not proved deposition was necessary.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Huff was a trial witness and his deposition was used to prepare his examination. In addition, Huff's
5/1/2013	1.25	taking deposition of Stasicha	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Stasicha conducted the forensic analysis of the evidence that Defendant Johnson submitted
5/1/2013	1.00	taking deposition of McWhorter	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. McWhorter conducted the forensic analysis of the evidence that Defendant Johnson submitted
5/1/2013	3.50	taking deposition of Duff	EW	Duff and Huff are excluded parties, not recoverable. Have not proved deposition was necessary.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Duff was a trial witness and his deposition was used to prepare his examination.
5/6/2013	0.50	reviewing Pikett documents on dog scent lineups, emailing paralegal about compiling list of cases for sending out subpoena duces tecum	EW	Pikett is an excluded party, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
5/12/2013	0.50	reviewing SJCSheriff's Office objections and response to subpoena duces tecum	EW	San Jacinto County is an excluded party with no common core of facts of legal claims asserted with Deputy Johnson, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
5/13/2013	0.25	emailing with ME about review of Pikett docs for subpoenas	EW	Pikett is an excluded party, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
5/14/2013	1.00	writing letter to Price regarding depositions	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Johnson was the Defendant in this case and both he and Rogers testified at trial. Their
5/14/2013	0.50	drafting subpoenas for depositions of Asst DAs, Neyland, the SJC clerks/assts	EW	San Jacinto County is an excluded party with no common core of facts of legal claims asserted with Deputy Johnson, not recoverable.	Discovery described in this entry is related to the claim against Defendant Johnson. It includes deposition subpoenas of the ADAs and clerks to rebut Defendant Johnson's defense that (a) he did not receive certain
5/14/2013	0.25	conferring with paralegal about Christopher Hammond current address	EW	Hammond is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown and Hammond is part of the same common core as claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
5/20/2013	0.25	drafting unopposed motion for production of documents pursuant to subpoena to SJC district clerk	EW	San Jacinto County is an excluded party with no common core of facts of legal claims asserted with Deputy Johnson, not recoverable.	Discovery described in this entry is related to the claim against Defendant Johnson, including attempt to locate arrest-warrant affidavit of Richard Winfrey, Jr. To the extent the discovery related to the claim

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
5/29/2013	0.25	confer with EW; review Petix's affidavit	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. This is particularly true for this entry which relates to an affidavit by an ADA, Jonathan Petix, to rebut Johnson's allegation that the DA wrote the arrest-warrant affidavits. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
6/19/2013	0.25	emailing with Price and Morse about Tracy Brown dep	EW	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
6/19/2013	0.25	t/c with Tracy Brown about deposition date	EW	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
6/20/2013	1.00	conferring with summer intern about research on TTCA	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
6/21/2013	1.50	taking dep of Gladden	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Ms. Gladden was one of Ms. Winfrey's teachers, who was discussed in Johnson's arrest-warrant affidavits. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
6/21/2013	0.75	preparing for dep of Gladden by reviewing documents	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Ms. Gladden was one of Ms. Winfrey's teachers, who was discussed in Johnson's
6/21/2013	2.00	taking dep of Neyland	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Chief Neyland was a police officer who responded to the scene of the Murray Burr murder; as such, he had knowledge of the police investigation and of the inconsistencies between Campbell's story and the crime scene. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.



Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
6/21/2013	0.75	preparing for dep of Neyland by reviewing documents	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Chief Neyland was a police officer who responded to the scene of the Murray Burr murder; as such, he had knowledge of the police investigation and of the inconsistencies between Campbell's story and the crime scene. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
6/24/2013	0.25	conferring with EW about scheduling of depositions of Winfreys and Brown	GH	Brown is not applicable to the successful claim against Deputy Johnson. Reduce time accordingly.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
6/24/2013	0.25	emailing with Morse and Price about rescheduling of depositions	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Morse was Keith Pikett's attorney and Jim Price was Sheriff Rogers, Defendant Johnson and

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
6/24/2013	0.25	conferring with GH about scheduling of depositions of Winfreys and Brown	EW	Brown is not applicable to the successful claim against Deputy Johnson. Reduce time accordingly.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. The depositions to be scheduled were of the Plaintiffs, which were necessary in this case and noticed by the Defendants. Development of evidence about Brown is part of the same common core as claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
6/25/2013	0.25	emailing with Morse and Price about rescheduling of depositions	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Morse was Keith Pikett's attorney and Jim Price was Sheriff Rogers, D+1283efendant Johnson and SJC's attorney. The depositions to be rescheduled were of the Plaintiffs, which were necessary in this case and noticed by the Defendants. Description is sufficient for Court to conduct meaningful review. <i>See</i>
6/26/2013	0.50	emailing with Morse and Price about discovery extension and dep dates	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
7/8/2013	0.25	t/c with Richard Winfrey Sr about Tracy Brown	EW	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
7/8/2013	0.50	t/c with Debbie Winfrey about Tracy Brown	EW	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
7/9/2013	0.25	conferring with EW about timing of depositions of Tracy Brown and docs to subpoena from her	GH	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
7/9/2013	2.00	reviewing documents produced by Texas Rangers	EW	Duff and Huff are excluded parties, not recoverable.	At this juncture, Huff and Duff were not parties to the litigation. As such, the documents produced by the Texas Rangers related to the investigation into the murder of Murray Burr, the subject of this lawsuit,

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
7/9/2013	0.25	conferring with GH about timing of depositions of Tracy Brown and docs to subpoena from her	EW	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
7/10/2013	3.25	reviewing Tracy Brown financial docs, taking notes	EW	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
7/11/2013	0.25	Review rider for Tracy Brown subpoena	GH	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
7/11/2013	2.75	reviewing Tracy Brown financial docs & trial testimony, taking notes	EW	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
7/11/2013	0.50	writing subpoena rider to Tracy Brown	EW	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
7/15/2013	0.50	preparing files to hand over before maternity leave	EW	Clerical work.	Plaintiffs are reducing the billing rate on this clerical work to the \$125/hour rate for a paralegal.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
7/22/2013	0.25	e-mailing Morse about dep dates, mediation dates	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. This entry does not specify any particular "deposition" that was necessary but instead a call about scheduling depositions in this case. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
7/22/2013	0.25	t/c with GH about mediation, dep dates	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. This entry does not specify any particular "deposition" that was necessary but instead a call about
7/22/2013	0.25	email and t/c with EW about mediation, deposition dates	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. This entry does not specify any particular "deposition" that was necessary but instead a call about scheduling depositions in this case. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
7/23/2013	0.25	writing emails to Morse and Helfand about dep dates, mediation date	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that depositions discussed were necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. This entry does not specify any particular "deposition" that was necessary but instead a call about scheduling depositions in this case. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
7/25/2013	2.25	reading Tracy Brown's motions to quash and writing response to the motions	EW	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
7/26/2013	1.00	reviewing court's orders, drafting another motion for disco extension, conferring with GH about dep dates	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
7/26/2013	2.75	reviewing docs produced by police depts in response to subpoenas, docs produced by Rangers, docs produced by the SJC CDA	EW	Duff and Huff are excluded parties, not recoverable.	At this juncture, Huff and Duff were not parties to the litigation. As such, the documents produced by the Texas Rangers--as well as the other police departments and in response to Plaintiff's subpoena--related to the investigation into the murder of Murray Burr, the subject of this lawsuit, and not to the liability of Huff or Duff. Regardless, claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
8/9/2013	0.25	corresponding with Shirley Lobel about Mike Brown interview	EW	Mike Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.



Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
8/15/2013	0.25	review EW memo on Mike Brown	GH	Mike Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
8/15/2013	1.25	t/c with Shirley Baccus-Lobel about Mike Brown interview, writing memo to GH and emailing GH	EW	Mike Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
8/19/2013	0.50	writing new letter to Tracy Brown's atty Burroughs re: dep date and doc subpoena	EW	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
9/10/2013	0.25	email with Richard Burroughs regarding deposition of Tracy Brown	GH	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
9/12/2013	0.50	review and edit draft settlement agreement with Pikett	GH	Pikett is an excluded party, not recoverable.	Plaintiffs are removing as part of their billing judgment. <i>See</i> Brief, Section V.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
9/13/2013	0.50	emails with Amy Boehm and Richard Burroughs regarding scheduling Tracy Brown deposition	GH	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
9/17/2013	1.00	Draft and disclose supplemental Rule 26(a)(1) disclosures; emails with Norman Giles and Bill Helfand re: Rule 26(a)(1) disclosures; draft motion to compel Tracy Brown deposition	GH	Tracy Brown is not applicable to the successful claim against Deputy Johnson. Reduce time accordingly.	Disclosures and emails did not include Brown. With regard to Brown's deposition, development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not
9/19/2013	1.50	Draft responses to Defendants' interrogatories	GH	Vague, unknown if applicable to all defendants with "Defendants".	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
9/20/2013	0.25	review voicemail and follow-up with opposing counsel regarding the deposition of Tracy Brown	GH	Tracy Brown is not applicable to the successful claim against Deputy Johnson. Reduce time accordingly.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
9/24/2013	1.50	review Tracy Brown testimony at Winfrey trials and Brown documents	GH	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
9/25/2013	2.00	Prepare for Brown deposition	GH	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.
9/26/2013	2.00	Prepare and take Brown deposition	GH	Tracy Brown is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Brown is part of the same common core as the claim against Johnson and therefore hours are not severable. <i>See</i> Brief, Section I.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
9/27/2013	0.50	Draft and file motion to withdraw motion to compel	GH	Clerical work. Time should be reduced for filing.	Work is not clerical when read in context. Moreover, even if clerical, solution is not to reduce time but to bill clerical work of an attorney at the rate for paralegal. <i>See</i> Brief, Section IV.
1/20/2014	0.25	conferring with GH about Megan's teacher's dep testimony	EW	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Megan's teachers and the information they allegedly communicated to the police were
1/20/2014	0.25	conferring with EW about Megan's teacher's dep testimony	GH	Vague. Could apply to all defendants, not just Deputy Johnson and the only successful claim. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Megan's teachers and the information they allegedly communicated to the police were
2/3/2014	3.25	drafting complaint	EW	Vague. Unknown if related to claims for all defendants.	Drafting Complaint for Plaintiff Megan Winfrey against Defendants Johnson, Rogers, and Pikett along with their respective municipalities. Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient
2/4/2014	2.50	review Megan Winfrey draft Complaint and confer with EW re: draft	GH	Vague. Unknown if related to claims for all defendants.	Drafting Complaint for Plaintiff Megan Winfrey against Defendants Johnson, Rogers, and Pikett along with their respective municipalities. Claims share common core and legal theories and

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
2/17/2014	6.00	researching potential federal claims (due process and 4th Ad), researching SOL on state law claims, reading cases, drafting complaint	EW	Vague. Unknown if related to claims for all defendants.	Drafting Complaint for Plaintiff Megan Winfrey against Defendants Johnson, Rogers, and Pikett along with their respective municipalities. Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
2/18/2014	0.75	drafting complaint	EW	Vague. Unknown if related to claims for all defendants.	Drafting Complaint for Plaintiff Megan Winfrey against Defendants Johnson, Rogers, and Pikett along with their respective municipalities. Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
2/20/2014	1.50	editing complaint	EW	Vague. Unknown if related to claims for all defendants.	Drafting Complaint for Plaintiff Megan Winfrey against Defendants Johnson, Rogers, and Pikett along with their respective municipalities. Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
2/20/2014	0.50	t/c with client about complaint	EW	Vague. Unknown if related to claims for all defendants.	Drafting Complaint for Plaintiff Megan Winfrey against Defendants Johnson, Rogers, and Pikett along with their respective municipalities. Claims share common core and legal theories and
2/21/2014	1.00	editing complaint	EW	Vague. Unknown if related to claims for all defendants.	Drafting Complaint for Plaintiff Megan Winfrey against Defendants Johnson, Rogers, and Pikett along with their respective municipalities. Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
3/6/2014	0.50	emailing Norman Giles the waivers of service for Rogers and Johnson and asking about waivers for Clark and County	EW	Should be discounted because Rogers and San Jacinto County not recoverable.	Service for Complaint for Plaintiff Megan Winfrey against Defendants Johnson, Rogers, and Pikett along with their respective municipalities. Claims share common core and legal theories and

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
4/16/2014	0.50	read draft Second Amended Complaint	GH	Vague. Unknown if related to claims for all defendants.	Edited Second Amended Complaint for Megan Winfrey's case. Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
4/17/2014	0.25	reading SJC (San Jacinto County) Defs' MTD on SOL	EW	Rogers and San Jacinto County are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
4/17/2014	0.50	reading SJC Defs' MTD on SOL	EW	San Jacinto County is an excluded party with no common core of facts of legal claims asserted with Deputy Johnson, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
6/11/2014	4.50	writing motion to bar Pikett	EW	Pikett and Fort Bend County are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/20/2014	0.50	confer with EW and JL about defendants' motions for summary judgment	GH	Vague, unknown if applicable to all defendants with "motions".	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/21/2014	0.50	confer with EW about pending motions for summary judgment	GH	Vague, unknown if applicable to all defendants with "motions".	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
11/21/2014	2.00	Review defendants' motions for summary judgment	GH	Vague, unknown if applicable to all defendants with "motions" and "Defendants".	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
12/29/2014	2.00	Read summary judgment motions	GH	Vague, unknown if applicable to all defendants with "motions".	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.



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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
12/29/2014	3.00	exhibit pulling and preparation for summary judgment response summary judgment response proofreading, editing toe and toa, and filing	LL	Clerical work. Time should be reduced for filing.	Work is not clerical when read in context. <i>See</i> Brief, Section IV.
1/6/2015	0.25	reading SJC defs' objections to exhibits in opp to SJ	EW	San Jacinto County is an excluded party with no common core of facts of legal claims asserted with Deputy Johnson, not recoverable.	SJC, Rogers and Johnson filed a joint MSJ. (Doc. 62). Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct meaningful review. <i>See</i> Brief, Section III.
1/16/2015	1.00	writing response to SJC defs' objections to exhibits in opp to SJ	EW	San Jacinto County is an excluded party with no common core of facts of legal claims asserted with Deputy Johnson, not recoverable.	SJC, Rogers and Johnson filed a joint MSJ. (Doc. 62). Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I. Description is sufficient for Court to conduct
9/28/2015	0.50	conferring with EW about whether to amend complaint to include Rangers; listen to recorded message regarding Jason King	GH	Duff and Huff are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
9/28/2015	0.50	conferring with GH about whether to amend complaint to include Rangers	EW	Duff and Huff are excluded parties, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
10/1/2015	0.25	writing letter to opp counsel with disclosure of recorded phone call between Winfrey and King and also Pikett's personnel records	EW	Pikett is an excluded party, not recoverable.	With respect to Pikett, claims share common core and legal theories and therefore hours are not severable. See Brief, Section I. Description is sufficient for Court to conduct meaningful review.
2/10/2017	0.50	reviewing Pikett's appeal brief	GH	Pikett is an excluded party, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
2/28/2017	1.00	edit DL brief in Pikett appeal in MW case	GH	Pikett is an excluded party, not recoverable.	Claims share common core and legal theories and therefore hours are not severable. <i>See</i> Brief, Section I.
3/29/2017	1.00	printing and compiling paper briefs for 5th circuit appeal	LL	Clerical work.	Plaintiffs are removing as part of their billing judgment and as clerical work. See Brief, Sections IV, V.
4/18/2017	1.00	printing and compiling paper briefs for 5th circuit appeal	LL	Clerical work.	Plaintiffs are removing as part of their billing judgment and as clerical work. See Brief, Sections IV, V.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
12/20/2017	0.75	writing motion for entry of final judgment; researching final judgment, since Pikett has been settled	EW	Pikett and Fort Bend County are excluded parties, not recoverable.	Plaintiffs are removing as part of their billing judgment. See Brief, Section V.
5/2/2018	3.00	assemble and print record excerpts for Megan Winfrey 5th Circuit appeal brief	LL	Clerical work.	Plaintiffs are removing as part of their billing judgment and as clerical work. See Brief, Sections IV, V.
6/25/2018	2.00	print and assemble paper copies for Megan Winfrey reply brief	LL	Clerical work.	Plaintiffs are removing as part of their billing judgment and as clerical work. See Brief, Sections IV, V.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
10/22/2019	0.25	t/c with Shanna Molinare about trial subpoenas for Rangers and TOPS witnesses	EW	Duff and Huff are excluded parties, not recoverable. Not related to Campbell interview and arrest affidavit.	Entry is related to trial subpoenas for witnesses who testified at trial, including Huff and Duff. Plaintiffs are entitled to recover hours spent preparing for trial.
10/24/2019	0.25	listening to recorded interview of Megan with Huff, in prep for dep	EW	Duff and Huff are excluded parties, not recoverable.	Entry is related to preparation for Megan Winfrey's deposition--not claims against Huff or Duff (who had long been dismissed as Defendants in Richard Winfrey's case and were never even sued in Megan
12/30/2019	0.50	print and send depositions to Richard Winfrey, Jr. and Megan Winfrey	AG	Clerical work.	Plaintiffs are removing as part of their billing judgment and as clerical work. See Brief, Sections IV, V.
1/2/2020	3.50	pull docs for Trial exhibits, pull docs for Trial exhibits and exhibits for MIL	BS	Clerical work.	Work is not clerical when read in context. See Brief, Section IV.

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Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
1/3/2020	8.75	stamp all exhibits, file MILs	BS	Clerical work.	Plaintiffs are removing as part of their billing judgment and as clerical work. See Brief, Sections IV, V.
1/6/2020	0.25	confer with EW and AG about hotel for trial; confer with EW and AG about death of Kirby Cowles	GH	Clerical work. Hotel.	Plaintiffs are reducing the billing rate on this clerical work to the \$125/hour rate for a paralegal.
1/6/2020	0.50	confer with EW and GH about hotel for trial, research possible locations	AG	Clerical work.	Plaintiffs are removing as part of their billing judgment and as clerical work. See Brief, Sections IV, V.
1/6/2020	0.50	download docket for Winfrey pretrial filings	AG	Clerical work.	Plaintiffs are removing as part of their billing judgment and as clerical work. See Brief, Sections IV, V.
1/7/2020	0.25	pull and print MILs for trial	BS	Clerical work.	Plaintiffs are removing as part of their billing judgment and as clerical work. See Brief, Sections IV, V.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
1/7/2020	1.00	redacting trial exhibits	BS	Clerical work.	Work is not clerical when read in context. See Brief, Section IV.
1/8/2020	1.75	redacting trial exhibits	BS	Clerical work.	Work is not clerical when read in context. See Brief, Section IV.
1/14/2020	0.25	t/c with Seth Dennis at OAG about crime lab witnesses, Huff and Duff	EW	Duff and Huff are excluded parties, not recoverable.	Entry is related to trial subpoenas for witnesses who testified at trial, including Huff and Duff. Plaintiffs are entitled to recover hours spent preparing for trial.
1/14/2020	0.25	conferring with Mary Cablk about availability for trial; possible dep in lieu of testimony due to-scheduling	EW	Vague. Cablk is canine scent expert. Have not proven that deposition was necessary for use in case on successful claim.	Claims share common core and legal theories and therefore hours are not severable. See Brief, Section I. Description is sufficient for Court to conduct meaningful review. See Brief, Section III.
1/17/2020	0.50	reviewing summary of audio of Ranger interview with Megan	EW	Duff and Huff are excluded parties, not recoverable. Not related to Campbell interview and arrest affidavit.	Entry is related to preparation for Huff, Duff and Plaintiffs' trial testimony. Each of Huff, Duff, Megan Winfrey and Richard Winfrey, Jr. testified at trial, including about the Ranger interview of Megan Winfrey, and Plaintiffs are entitled to compensation for reasonable hours
1/21/2020	4.00	review and redact exhibits	AG	Clerical work.	Work is not clerical when read in context. See Brief, Section IV.

**Response to Defendants' Objections to Attorneys' Fees**

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
1/21/2020	1.00	pull exhibits, proof and file Plaintiff's Motion to Supplement Motion to Bar Glass	LL	Clerical work. Time should be reduced for filing.	Work is not clerical when read in context. See Brief, Section IV.
1/23/2020	1.00	redacting trial exhibits	LL	Clerical work.	Work is not clerical when read in context. See Brief, Section IV.
1/26/2020	1.00	Listen to Hammond audio-recorded interview	GH	Hammond is not applicable to the successful claim against Deputy Johnson.	Development of evidence about Hammond is part of the same common core as claim against Johnson and therefore hours are not severable. See Brief, Section I. Moreover, review of the Hammond interview was
1/26/2020	5.50	listening to Ranger's interviews of Adam Szarf, Megan Winfrey, Christopher Hammond, Richard Winfrey, Sr., Richie and also Richie arrest audio recording; creating summaries	EW	Hammond and Ranger Huff and Duff are applicable to the successful claim against Deputy Johnson.	Development of evidence about Hammond is part of the same common core as claim against Johnson and therefore hours are not severable. See Brief, Section I. Moreover, review of the Hammond interview was
1/29/2020	2.00	Assemble and ship supplies to Houston for trial	AG	Clerical work.	Plaintiffs are removing as part of their billing judgment and as clerical work. See Brief, Sections IV, V.
2/1/2020	6.00	print out exams, pull deposition pages for impeachment or refresh recollection; print out and edit demonstratives; edit and listen to opening statement and provide comments to GH and EW	AG	Clerical work for printing. Time should be reduced.	Work is not clerical when read in context. See Brief, Section IV.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
2/1/2020	4.00	trial digests for robertson, rogers, johnson, duff, huff	LL	Delete. Duplicative time entry.	Plaintiffs are removing as duplicative.
2/4/2020	2.00	print exams; pull exhibits for Johnson cross- examination and Huff cross-examination	AG	Clerical work for printing. Time should be reduced.	Work is not clerical when read in context. See Brief, Section IV.
2/7/2020	6.00	driving Mark Price to/from Coldspring to/from court for testimony	AG	Excessive and clerical. Approx. 140 miles round trip.	Work is not clerical when read in context. See Brief, Section IV.



Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
2/9/2020	0.75	writing Plaintiff's supplemental jury instruction No. 22 and filing it	EW	Clerical work. Time should be reduced for filing.	Work is not clerical when read in context. See Brief, Section IV.
2/9/2020	4.00	print and pull deposition pages and exhibits for exams (Megan Winfrey, Rogers, Dr. Marshall); print cases for EW	AG	Clerical work.	Work is not clerical when read in context. See Brief, Section IV.
4/28/2020	5.00	find citations pull exhibits and draft toa/toc for rule 58 response filing	LL	Delete. Duplicative time entry.	Plaintiffs are removing as duplicative.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
5/6/2020	0.25	draft motion for extension	LL	Delete. Duplicative time entry.	Plaintiffs are removing as duplicative.
5/11/2020	1.00	draft toa/toc for rule 58 reply filing	LL	Delete. Duplicative time entry.	Plaintiffs are removing as duplicative.
1/7/2022	2.00	edited, formatted and filed motion for extension of time	LL	Clerical work. Time should be reduced for filing.	Work is not clerical when read in context. See Brief, Section IV.

Date	Hours	Task	Time Keeper	Objection	Plaintiffs' Response
1/25/2022	3.00	drafted and finalized toc and toa for PREB, drafted certificates, formatted final brief, and filed	LL	Clerical work. Time should be reduced for filing.	Work is not clerical when read in context. See Brief, Section IV.